## Case 1:14-cr-00810-CM Document 94 Filed 07/30/15 Page 1 of 1

Case 1:14-cr-00810-CM Document 90 Filed 07/30/15 Page 1 of 1

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**MEMO ENDORSED** 

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Office Manager

July 30, 2015

7/30/15

## BY ECF

The Honorable Colleen McMahon United States District Judge Southern District of New York Daniel P. Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re:

United States v. Moshe Mirilishvili, 14 Cr. 810 (CM)

Extension of time to file motions is granted

Dear Judge McMahon:

This letter is submitted on behalf of defendant Dr. Moshe Mirilashvili, whom I represent in the above-entitled matter, and seeks a one-week adjournment of the due date for Dr. Mirilashvili's pretrial motions, which are due tomorrow, July 31, 2015. I have spoken with Assistant United States Attorneys Edward B. Diskant and Brooke E. Cucinella, and they have informed me that the government does not object to this request.

The reasons for the one-week adjournment are as follows: in addition to discussions between the government and myself regarding a possible resolution in the case, I also have three sentencing submissions due within the next five days. I will also be flying to Chicago midday tomorrow to attend the American Bar Association's annual meeting there, as I am the National Association of Criminal Defense Lawyers's delegate to the ABA's Criminal Justice Section Council, which will be meeting this weekend.

Accordingly, it is respectfully requested that the Court adjourn the due date for Dr. Mirilashvili's pretrial motions one week until next Friday, August 7, 2015. As noted above, the government does not object to this application.

Very truly yours,

Joshua L. Dratel

JLD/

cc: Edward B. Diskant Brooke E. Cucinella

Assistant United States Attorneys